

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

INTELLECTUAL VENTURES I LLC,

Plaintiff,

V.

SYMANTEC CORPORATION,

Defendant.

Case No. 10-cv-1067-LPS

JURY TRIAL DEMANDED

FILED UNDER SEAL

**DECLARATION OF RICHARD W. HESS IN SUPPORT OF
INTELLECTUAL VENTURES' MOTION FOR ENTRY OF JUDGMENT**

I, Richard W. Hess, declare:

1. I am an attorney in the law firm of Susman Godfrey L.L.P., counsel for Plaintiff Intellectual Ventures I LLC in the above-captioned action. I am admitted to practice before this Court *pro hac vice*, and submit this declaration In Support of Intellectual Ventures’ Motion for Entry of Judgment.

2. Attached as Exhibit A is a true and correct copy of excerpts from the March 20, 2013 Rebuttal Expert Report Regarding Damages Specific to Symantec of W. Christopher Bakewell.

3. Attached as Exhibit B is a true and correct copy of excerpts from the February 13, 2013 Expert Report of Michael J. Wagner.

4. Attached as Exhibit C is a true and correct copy of the February 20, 2015 Declaration of Michael J. Wagner.

5. Attached as Exhibit D is a true and correct copy of the June 28, 2004 Symantec Press Release, “Symantec Brightmail Anti-Spam Version 6.0 Delivers Next Generation Spam-Fighting Power and Control to Enterprises”.

6. Attached as Exhibit E is a true and correct copy of the November 17, 2008 Press Release, “Symantec Completes Acquisition of MessageLabs”.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 20th day of February, 2015.

/s/Richard W. Hess
Richard. W. Hess